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C O N F I D E N T I A L

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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ERIN GURSSLIN,

Plaintiff,

Civil Action No. 20-cv-6508

v.

THE CITY OF ROCHESTER, a municipal entity, POLICE  
OFFICER JEREMY NELLIST, POLICE OFFICER JOSHUA  
KELLY, COMMANDER FABIAN RIVERA, LIEUTENANT AARON  
SPRINGER,

Defendants.

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Video-recorded Deposition Upon Oral Examination of:

Officer Jonathan P. Laureano

Location: Alliance Court Reporting, Inc.  
109 South Union Street, Suite 400  
Rochester, New York 14607

Date: February 27, 2023

Time: 10:00 a.m.

Reported By: KIMBERLY A. BONSIGNORE

Alliance Court Reporting, Inc.  
109 South Union Street, Suite 400  
Rochester, New York 14607

**Confidential**

**2**

1 A P P E A R A N C E S

2 Appearing Remotely on Behalf of Plaintiff:

3 Elliot D. Shields, Esq.

4 Roth & Roth LLP

5 192 Lexington Avenue, Suite 802

6 New York, New York 10016

7 eshields@rothandrothlaw.com

8

9 Appearing on Behalf of Defendants:

10 Peachie L. Jones, Esq.

11 City of Rochester Law Department

12 City Hall, Room 400A

13 30 Church Street

14 Rochester, New York 14614

15 peachie.jones@cityofrochester.gov

16

17 Also Present:

18 Kenneth Williamson, Videographer

19 Alliance Court Reporting, Inc.

20 109 South Union Street, Suite 400

21 Rochester, New York 14607

22

23

\* \* \*

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1 P R O C E E D I N G S

2 for their certified transcript charge, including any  
3 expedite or other related production charges in  
4 accordance with Rochester Rules;

5 AND IT IS FURTHER STIPULATED, that the  
6 Notary Public, KIMBERLY A. BONSIGNORE, may administer  
7 the oath to the witness.

10:39:36 8 \* \* \*

10:39:36 9 THE VIDEOGRAPHER: We are on the record.

10:39:45 10 The time is 10:40 a.m., on Monday,  
10:39:50 11 February 27, 2023.

10:39:53 12 My name is Ken Williamson for Alliance  
10:39:56 13 Court Reporting located at 109 South Union Street,  
10:39:59 14 Rochester, New York.

10:39:59 15 We are located today at Alliance Court  
10:40:07 16 Reporting. The deponent is here, and we do have an  
10:40:10 17 attorney on Zoom, so it is a hybrid deposition.

10:40:15 18 We are about to begin the video-recorded  
10:40:17 19 deposition of Officer Jonathan Laureano, in the matter  
10:40:23 20 of Erin Gursslin, plaintiff, versus the City of  
10:40:25 21 Rochester, a municipal entity, Police Officer Jeremy  
10:40:29 22 Nellist, Police Officer Joshua Kelly, Commander Fabian  
10:40:34 23 Rivera, and Lieutenant Aaron Springer, defendants.

10:40:36 24 Today's matter is being videotaped on  
10:40:40 25 behalf of the plaintiff.



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1 OFFICER JONATHAN P. LAUREANO - BY MR. SHIELDS

11:26:20 2 that moment.

11:26:21 3 Q. Okay. Had you ever received specific  
11:26:24 4 training about judging any objective factors that a  
11:26:32 5 dog displays to determine whether what you perceive to  
11:26:38 6 be a threat is an actual threat?

11:26:40 7 MS. JONES: Objection.

11:26:44 8 A. The department did training on that some  
11:26:49 9 time ago.

11:26:50 10 Q. Okay. What do you remember from that  
11:26:52 11 training?

11:26:52 12 A. Some photos of aggressive dogs and just  
11:27:00 13 more of a recognition on -- you know, things, again,  
11:27:05 14 that we would already have been -- were already taught  
11:27:09 15 about the growl -- you know, how they are as far as  
11:27:14 16 posture or demeanor, like growling and like -- I don't  
11:27:25 17 know -- lunging.

11:27:25 18 If you want to call it growling, like  
11:27:28 19 lunging like when they snap their jaws. There's  
11:27:30 20 traits that are exhibited that are quite apparent when  
11:27:36 21 a dog is not happy to see you, I'd say.

11:27:41 22 Q. Okay. If the traits are so apparent, what  
11:27:46 23 was the point of the training?

11:27:47 24 MS. JONES: Objection.

11:27:48 25 A. I would say that there can never be too



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1 OFFICER JONATHAN P. LAUREANO - BY MR. SHIELDS

11:27:52 2 much training, and refreshers are always good.

11:27:55 3 Q. Did the training help you to recognize

11:27:59 4 these signs of a dog's aggressiveness, aside from what

11:28:09 5 you've learned during your experience working in the

11:28:09 6 field as a police officer?

11:28:10 7 A. I mean, I wouldn't say that it was

11:28:12 8 anything I hadn't heard before, but it was -- like I

11:28:15 9 said, served as a good reinforcement because there are

11:28:19 10 individuals who transfer, you know, go to

11:28:21 11 administrative positions who are off the road for some

11:28:25 12 time, and they come back to the road. Sometimes

11:28:27 13 people forget things or lose things, and that's why

11:28:32 14 you have in-services.

11:28:33 15 Q. Okay. Did the training include anything

11:28:35 16 about how to avoid shooting a dog that you perceive to

11:28:41 17 be aggressive?

11:28:41 18 A. I believe it did. I don't recall

11:28:43 19 specifically what that was, but I don't believe it --

11:28:47 20 I'm not sure if it deviated too much again from what

11:28:49 21 we were already taught about time, distance, and

11:28:53 22 cover.

11:28:54 23 Q. Okay. With any of the instances that you

11:29:00 24 shot at a dog, were you ever disciplined?

11:29:05 25 A. No.



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